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BY: STEVEN J. FRAM, ESQUIRE

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PATRICK BRADY, et al.,)
Plaintiffs,)
v.) Civil Action No. 02-2917 (JEI)
AIR LINE PILOTS ASSOCIATION,)
INTERNATIONAL,)
Defendant.)

)

**DECLARATION OF STEVEN J. FRAM, ESQUIRE, IN SUPPORT OF DEFENDANT'S
MOTION TO REVOKE *PRO HAC VICE* ADMISSIONS**

STEVEN J. FRAM hereby declares as follows:

1. I am a member of the Bar of this Court and am a shareholder in the law firm of Archer & Greiner, P.C., attorneys for Defendant, Air Line Pilots Association, International.
2. I am submitting this Declaration in order to provide copies of certain deposition and trial transcripts and other materials that are referred to in the brief being filed by Defendant on August 10, 2011, in support of the Defendant's Motion to Revoke Pro Hac Vice Admissions.

3. True and correct copies of pleadings, excerpts of deposition transcripts and trial transcripts and trial exhibits are attached as follows to this Declaration:

EXHIBIT DESCRIPTION

Pleadings

A Complaint dated February 14, 2005, in Baptiste & Wilder, P.C. v. TWA MEC, et al.

Deposition Transcripts

B Deposition of Sally Young dated September 15, 2006

C Deposition of Howard Hollander dated September 19, 2006

D Deposition of Roland Wilder dated November 6, 2006, in Baptiste & Wilder, P.C. v. TWA MEC, et al.

E Deposition of Roland Wilder dated August 8, 2008

F Deposition of Roland Wilder dated April 21, 2011

G Deposition of Alan Altman dated April 28, 2011

Trial Transcripts

H Trial Transcript dated November 21-22, 2006, in Baptiste & Wilder, P.C. v. TWA MEC, et al.

I Trial Transcript, Volume 2, of June 8, 2011

J Trial Transcript, Volume 3, of June 9, 2011

K Trial Transcript, Volume 4, of June 13, 2011

L Trial Transcript, Volume 6, of June 15, 2011

M Trial Transcript, Volume 7, of June 16, 2011

N Trial Transcript, Volume 8, of June 20, 2011

O Trial Transcript, Volume 9, of June 22, 2011

P Trial Transcript, Volume 10, of June 23, 2011

Q Trial Transcript, Volume 13, of June 29, 2011

R Trial Transcript, Volume 16, of July 6, 2011

S Trial Transcript, Volume 18, of July 11, 2011

T Trial Transcript, Volume 19, of July 12, 2011

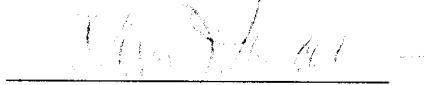
Trial Exhibits

U P-435, Email from Robert Reifsnyder to Robert Johnson regarding "Get Real" Comment, dated April 17, 2001 [not in evidence]

V D-025, St. Louis Council 3 Information Update, dated May 8, 2001

- W D-078, Minutes of TWA-MEC Special Meeting on April 23 and 24, 2001
- X D-176, Letter from Roland Wilder to Robert Pastore attaching April 2001 Bill, Expense Report, and Receipts, dated May 9, 2001
- Y D-179, Meeting agenda for April 2, 2001 TWA-MEC Special Meeting, as revised March 30, 2001
- Z D-210, Email from Robert Stow re: Special MEC Meeting, dated March 29, 2001
- AA D-223, TWA-MEC Meeting Minutes for TWA-MEC Special Meeting on March 21-22, 2001
- BB D-233, Letter from Robert Pastore to Capt. Duane Woerth, dated July 10, 2001
- CC D-236, Affidavit of Roland P. Wilder, Jr., dated February 20, 2009
- DD D-382, Email from Robert Stow re: Special MEC Meeting, dated March 19, 2001

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on August 10, 2011.



Steven J. Fram, Esquire

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